
PIA Analysis Worksheet and Summary Template

The template for an information technology (IT) system Privacy Impact Assessment (PIA) Analysis Worksheet and Summary Template begins on the following page. The Template covers the four major categories of information required for inclusion into the PIA: system characterization, information sharing practices, Web site practices, and security controls.

NASA 10 FNMS

**NASA
FOREIGN
NATIONAL
MANAGEMENT
SYSTEM**

Date: December 16, 2005

NASA IT Privacy Impact Assessment (PIA) Analysis Worksheet

The PIA determines what kind of information in identifiable form (IIF), if any, is contained within a system, what is done with that information, and how that information is protected. Systems with IIF are subject to an extensive list of requirements based on privacy laws, regulations, and guidance.

Identifying Numbers (Use N/A for items that are Not Applicable)

Application Name (generally the name that the system is accessed by. www.nasa.gov, when Web enabled, for example):

NASA FOREIGN NATIONAL MANAGEMENT SYSTEM (NFNMS)

Application Owner:

Director, Security Management Division, Office of Security and Program Protection

(Person who is responsible for funding)

Phone Number: 202-358-2010

E-Mail: jpiaseck@nasa.gov

System Manager

Extranet Secure Portals Group

(Responsible for system technical operation)

Phone Number: 804-744-8800

E-Mail: helpdesk@espgroup.net

NASA Cognizant Official:

Will Morrison

(NASA individual responsible for management of daily operations)

Phone Number: 202-358-2010

E-Mail: wmorrison@nasa.gov

Activity/Purpose of Application:

Records are maintained and used by NASA to document, track, manage, analyze, and/or report on foreign visit and assignment access to NASA facilities

Mission Program/Project Supported:

The NFNMS supports the Institutions and Management Mission Support Office, Office of Security and Program Protection, as well as the Chief of Strategic Communications, Office of External Relations

IT Security Plan Number:

HQ-02-0001

System Location (Center or contractor office building, room, city, and state):

Center/Contractor: Extranet Secure Portals Group

Street Address: 1225 Clark Street, Suite 1103

City Arlington ST VA ZIP 22202

No.	Privacy Question Sets	User Response			Comments
		Yes	No	N/A	
System Characterization and Data Categorization					
1	Has/Have any of the major changes listed in the Comments column occurred to the system since April 2003 or the conduct of the last PIA? If yes, please check which change(s) have occurred.	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Conversions <input type="checkbox"/> Anonymous to Non-Anonymous <input type="checkbox"/> Significant System Management Changes <input type="checkbox"/> Significant Merging <input type="checkbox"/> New Public Access <input type="checkbox"/> Commercial Sources <input type="checkbox"/> Internal Flow or Collection <input type="checkbox"/> New Interagency Use <input checked="" type="checkbox"/> Alteration in Character of Data
2	Does/Will the system contain Federal records?	X	<input type="checkbox"/>	<input type="checkbox"/>	
3	If the system contains/will contain Federal records, under which disposition authority item in the NASA Records Retention Schedules or the General Records Schedules are/will the records be retained and disposed of or archived?				Schedule Item: NRRS 1/35
4	Do the records in the system pertain to active programs/projects?	<input type="checkbox"/>	X	<input type="checkbox"/>	
5	Are the records Vital records for the organization?	<input type="checkbox"/>	X	<input type="checkbox"/>	
6	Are backup files (tapes or other media) being stored off-site? If yes, please indicate in the comment field where backups are located.	X	<input type="checkbox"/>	<input type="checkbox"/>	<u>Backup storage location:</u> Back-up tapes are stored in an off-site safe deposit box.

No.	Privacy Question Sets	User Response			Comments
		Yes	No	N/A	
System Characterization and Data Categorization					
7	<p>Does/Will the system <i>contain (store)</i> information in identifiable form (IIF) within any database(s), record(s), file(s) or Web site(s) hosted by this system?</p> <p>Note: If yes, check all that apply in the Comments column. If the category of personal information is not listed, please check "Other" and identify the category.</p> <p>Please note: This question seeks to identify all personal information contained within the system. This includes any IIF, whether or not it is subject to the <i>Privacy Act</i>, whether the individuals are employees, the public, research subjects, or business partners, and whether provided voluntarily or collected by mandate. Later questions will try to understand the character of the data and its applicability to the requirements under the <i>Privacy Act</i> or other legislation.</p> <p>[Autofill all relevant questions with N/A.]</p>	X	<input type="checkbox"/>	<input type="checkbox"/>	<p>Personal Information:</p> <p>X Name</p> <p>X Date of birth</p> <p>X Social Security Number (or other number originated by a government that specifically identifies an individual)</p> <p><input type="checkbox"/> Photographic identifiers (e.g., photograph image, x-rays, and video)</p> <p><input type="checkbox"/> Driver's license</p> <p><input type="checkbox"/> Biometric identifiers (e.g., fingerprint and voiceprint)</p> <p><input type="checkbox"/> Mother's maiden name</p> <p><input type="checkbox"/> Vehicle identifiers (e.g., license plates)</p> <p>X Mailing address</p> <p>X Phone numbers (e.g., phone, fax, and cell)</p> <p><input type="checkbox"/> Medical records numbers</p> <p><input type="checkbox"/> Medical notes</p> <p><input type="checkbox"/> Financial account information and/or numbers (e.g., checking account number and Personal Identification Numbers [PIN])</p> <p>X Certificates (e.g., birth, death, and marriage)</p> <p><input type="checkbox"/> Legal documents or notes (e.g., divorce decree, criminal records, or other)</p> <p><input type="checkbox"/> Device identifiers (e.g., pacemaker, hearing aid, or other)</p> <p><input type="checkbox"/> Web Uniform Resource Locators (URL)</p> <p>X E-mail address</p> <p><input type="checkbox"/> Education records</p> <p><input type="checkbox"/> Military status and/or records</p> <p><input type="checkbox"/> Employment status and/or records</p> <p>X Foreign activities and/or interests</p> <p>X Other: <u>Citizenship</u></p>
8	<p>Indicate all the categories of individuals about whom IIF is or will be collected.</p>			<input type="checkbox"/>	<p><input type="checkbox"/> Employees</p> <p>X Public citizens (US Representatives of foreign entities)</p> <p><input type="checkbox"/> Patients</p> <p><input type="checkbox"/> Business partners/contacts (federal, state, local agencies)</p> <p>X Vendors/Suppliers/Contractors</p> <p>X Other – <u>Foreign Nationals</u></p>

No.	Privacy Question Sets	User Response			Comments
		Yes	No	N/A	
System Characterization and Data Categorization					
9	<p>Are records on the system (or will records on the system be) retrieved by one or more data elements?</p> <p>Note: If yes, specify in the Comments column data elements will be used in retrieving the records (i.e., using a record number, name, social security number, or other data element or record locator methodology). If the category of personal information is not listed, please check "Other" and identify the category.</p>	X	<input type="checkbox"/>	<input type="checkbox"/>	<p>Personal Information:</p> <p>X Name</p> <p>X Social Security Number (or other number originated by a government that specifically identifies an individual)</p> <p><input type="checkbox"/> Photographic identifiers (e.g., photograph image, x-rays, and video)</p> <p><input type="checkbox"/> Driver's license</p> <p><input type="checkbox"/> Biometric identifiers (e.g., fingerprint and voiceprint)</p> <p><input type="checkbox"/> Mother's maiden name</p> <p><input type="checkbox"/> Vehicle identifiers (e.g., license plates)</p> <p><input type="checkbox"/> Mailing address</p> <p><input type="checkbox"/> Phone numbers (e.g., phone, fax, and cell)</p> <p><input type="checkbox"/> Medical records numbers</p> <p><input type="checkbox"/> Medical notes</p> <p><input type="checkbox"/> Financial account information and/or numbers (e.g., checking account number and Personal Identification Numbers [PIN])</p> <p><input type="checkbox"/> Certificates (e.g., birth, death, and marriage)</p> <p><input type="checkbox"/> Legal documents or notes (e.g., divorce decree, criminal records, or other)</p> <p><input type="checkbox"/> Device identifiers (e.g., pacemaker, hearing aid, or other)</p> <p><input type="checkbox"/> Web Uniform Resource Locators (URL)</p> <p><input type="checkbox"/> E-mail address</p> <p><input type="checkbox"/> Education records</p> <p><input type="checkbox"/> Military status and/or records</p> <p><input type="checkbox"/> Employment status and/or records</p> <p>X Foreign activities and/or interests</p> <p>X Other: <u>Citizenship; certificates (visa, et al.)</u></p>
10	Are/Will records on 10 or more individuals containing IIF [be] maintained, stored or transmitted/passed through this system?	X	<input type="checkbox"/>	<input type="checkbox"/>	
11	<p>Is the system (or will it be) subject to the Privacy Act?</p> <p>Note: If the answer to questions 7, 9, and 10 were yes, the system will likely be subject to the <i>Privacy Act</i>. System owners should contact their Center PAM for assistance with this question if they are uncertain of the applicability of the <i>Privacy Act</i>.</p>	X	<input type="checkbox"/>	<input type="checkbox"/>	Autofill"yes" when yes is marked for 7 and 9; "no," if 7 and 9 are marked "no."
12	<p>Has a Privacy Act System of Record (SOR) Notice been published in the Federal Register for this system?</p> <p>Note: If no, explain why not in the Comments column.</p>	X	<input type="checkbox"/>	<input type="checkbox"/>	<p><input type="checkbox"/> No IIF is contained in the system.</p> <p><input type="checkbox"/> IIF is in the system, but records are not retrieved by IIF.</p> <p><input type="checkbox"/> Should have published an SOR, but was unaware of the requirement.</p> <p><input type="checkbox"/> System is required to have an SOR but is not yet procured or operational.</p> <p><input type="checkbox"/> Other: _____</p>
13	If a SOR Notice has been published, have major changes to the system occurred since publication of the SOR?	<input type="checkbox"/>	X	<input type="checkbox"/>	
Information Sharing Practices					
14	Is the IIF in the system voluntarily submitted (or will it be)?	X	<input type="checkbox"/>	<input type="checkbox"/>	

No.	Privacy Question Sets	User Response			Comments
		Yes	No	N/A	
15	Does/Will the system <i>collect</i> IIF directly from individuals? Note: If yes, identify in the Comments column the IIF the system collects or will collect directly from individuals. If the category of personal information is not listed, please check "Other" and identify the category.	X	<input type="checkbox"/>	<input type="checkbox"/>	Information will be collected directly from individuals.
16	Does/Will the system <i>collect</i> IIF from other resources (i.e., databases, Web sites, etc.)? Note: If yes, specify the resource(s) and IIF in the Comments column.	<input type="checkbox"/>	X	<input type="checkbox"/>	
17	Does/Will the system <i>populate</i> data for other resources (i.e., do databases, Web sites, or other resources rely on this system's data)? Note: If yes, specify resource(s) and purpose for each instance in the Comments column.	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/> Resource: _____ <input type="checkbox"/> Resource: _____ <input type="checkbox"/> Resource: _____ <input type="checkbox"/> Resource: _____ <input type="checkbox"/> Resource: _____
18	Does/Will the system <i>share</i> or <i>disclose</i> IIF with agencies external to NASA, or other people or organizations outside NASA? Note: If yes, specify with whom and for what purposes, and identify which data elements in the Comments column. If the category of personal information is not listed, please check "Other" and identify the category.	X	<input type="checkbox"/>	<input type="checkbox"/>	With whom and for what purposes: X FBI – law enforcement X DHS – law enforcement X DOE – tracking of FN's with access to both agencies

No.	Privacy Question Sets	User Response			Comments
		Yes	No	N/A	
19	<p>If the IIF in the system is or will be matched against IIF in one or more other computer systems internal or external to NASA, are (or will there be) computer data matching agreement(s) in place?</p> <p>If yes, indicate in the Comments column internal or external and the system(s) with data which are matched.</p>	<input type="checkbox"/>	<input type="checkbox"/>	X	<p>Location of other systems involved in matching:</p> <p><input type="checkbox"/> Internal NASA</p> <p><input type="checkbox"/> External to NASA</p> <p>Other systems involved:</p> <p>_____</p> <p>_____</p> <p>If answered "No," auto fill 20 with N/A.</p>
20	<p>If data matching activities will occur, will the IIF be de-identified, aggregated, or otherwise made anonymous?</p> <p>Note: If yes, please describe this use in the Comments column.</p>	<input type="checkbox"/>	<input type="checkbox"/>	X	<p><input type="checkbox"/> De-identified</p> <p><input type="checkbox"/> Aggregated</p> <p><input type="checkbox"/> Other</p>
21	<p>Is there a process, either planned or in place, to notify organizations or systems that are dependent upon the IIF contained in this system when changes occur (i.e., revisions to IIF, when the system encounters a major change, or is replaced)?</p>	<input type="checkbox"/>	X	<input type="checkbox"/>	
22	<p>Is there a process, either planned or in place, to notify and obtain consent from the individuals whose IIF is in the system when major changes occur to the system (e.g., disclosure and/or data uses have changed since the notice at the time of the original collection)?</p>	<input type="checkbox"/>	X	<input type="checkbox"/>	
23	<p>Is there/Will there be a process in place for individuals to choose how their IIF data is used?</p> <p>Note: If yes, please describe the process for allowing individuals choice in the Comments column.</p>	<input type="checkbox"/>	<input type="checkbox"/>	X	<p>Process:_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
24	<p>Is there/Will there be a complaint process in place for individuals who believe their IIF has been inappropriately obtained, used, or disclosed, or that the IIF is inaccurate?</p> <p>Note: If yes, please describe briefly the notification process in the Comments column.</p>	<input type="checkbox"/>	X	<input type="checkbox"/>	<p>Process:_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
25	<p>Are there or will there be processes in place for periodic reviews of IIF contained in the system to ensure the data's integrity, availability, accuracy, and relevancy?</p> <p>Note: If yes, please describe briefly the review process in the Comments column.</p>	X	<input type="checkbox"/>	<input type="checkbox"/>	<p>Process: Insured through tri-annual reviews of Information Technology Security Plans and Risk Assessment Plans, as required by FISMA 2002</p>

No.	Privacy Question Sets	User Response			Comments
		Yes	No	N/A	
26	Are there/Will there be rules of conduct in place for access to IIF on the system? Note: If yes, identify in the Comments column all users with access to IIF on the system and for what purposes they use the IIF.	X	<input type="checkbox"/>	<input type="checkbox"/>	X Users X Administrators X Developers X Contractors For what purposes: The routine performance of their assigned duties.
27	Is there a process in place to log routine and non-routine disclosures and/or unauthorized access? If yes, check in the Comments column which kind of disclosures are logged.	X	<input type="checkbox"/>	<input type="checkbox"/>	Disclosures logged: X Routine X Non-routine <input type="checkbox"/> Public Internet_____
Web site Host – Question Sets					
28	Does/Will the system host a Web site? Note: If yes, identify what type of site the system hosts in the Comments column. If no, check “No” for all remaining questions in the “Web Site Host Question Sets” section and answer questions starting with the “Administrative Controls” section beginning with question 42.	X	<input type="checkbox"/>	<input type="checkbox"/>	Type of site: <input type="checkbox"/> Public Internet_____ <input type="checkbox"/> Internal NASA _____ <input type="checkbox"/> Both_____ X Other: Security features prohibit unauthorized users from accessing the InterNet available site.
29	Is the Web site (or will it be) accessible by the public or other entities (i.e., federal, state, and local agencies, contractors, third-party administrators, etc.)?	<input type="checkbox"/>	X	<input type="checkbox"/>	
30	Is the Agency Web site privacy policy statement posted (or will it be posted) on the Web site?	X	<input type="checkbox"/>	<input type="checkbox"/>	
31	Is the Web site’s privacy policy in machine-readable format, such as Platform for Privacy Preferences (P3P)? Note: If no, please describe in the Comments column your timeline to implement P3P requirements for this system.	<input type="checkbox"/>	<input type="checkbox"/>	X	This web site is not a publicly available web site.

No.	Privacy Question Sets	User Response			Comments
		Yes	No	N/A	
32	Does the Web site employ (or will it employ) persistent tracking technologies? Note: If yes, identify types of cookies in the Comments column. If persistent tracking technologies are in place, please indicate the official who authorized the use of the persistent tracking technology.	X	<input type="checkbox"/>	<input type="checkbox"/>	X Session Cookies <input type="checkbox"/> Persistent Cookies <input type="checkbox"/> Web bugs <input type="checkbox"/> Web beacons <input type="checkbox"/> Other (Describe): _____ Authorizing Official: <u>John A. Piasecky</u> Authorizing Date: <u>March 1, 2005</u>
33	Does/Will the Web site collect or maintain personal information from or about children under the age of 13?	<input type="checkbox"/>	X	<input type="checkbox"/>	If marked "No," autofill "N/A" in next question.
34	If the Web site does/will collect or maintain personal information from or about children under the age of 13, please indicate what information and how the information is collected.			X	<input type="checkbox"/> Actively directly from the child <input type="checkbox"/> Passively through cookies <input type="checkbox"/> Both of the above What Information collected: _____ _____ _____
35	If the Web site does/will collect or maintain personal information from or about children under the age of 13, is the information shared with any non-NASA organizations, grantees, universities, etc. Note: If yes, also identify the non-NASA organizations in the comments field	<input type="checkbox"/>	<input type="checkbox"/>	X	Information is shared with: _____ _____ _____ If "no," autofill "N/A" in items 36 & 37.
36	If the Web site does/will collect or maintain personal information from or about children under the age of 13, specify in the comments field what method is used for obtaining parental consent.			X	Method used for obtaining parental consent (please check all that apply) <input type="checkbox"/> No consent is obtained <input type="checkbox"/> Simple email <input type="checkbox"/> email accompanied by digital signature <input type="checkbox"/> signed form from the parent via postal mail or facsimile <input type="checkbox"/> accepting and verifying a credit card number in connection with a transaction <input type="checkbox"/> taking calls from parents, through a toll-free telephone number staffed by trained personnel

No.	Privacy Question Sets	User Response			Comments
		Yes	No	N/A	
37	<p>Does/Will the Web site collect IIF electronically from any individuals?</p> <p>Note: If yes, identify what IIF the system collects in the Comments column. If the category of personal information is not listed, please check "Other" and identify the category.</p>	<input type="checkbox"/>	X	<input type="checkbox"/>	<p>Personal Information:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Name <input type="checkbox"/> Date of birth <input type="checkbox"/> Social Security Number (or other number originated by a government that specifically identifies an individual) <input type="checkbox"/> Photographic identifiers (e.g., photograph image, x-rays, and video) <input type="checkbox"/> Driver's license <input type="checkbox"/> Biometric identifiers (e.g., fingerprint and voiceprint) <input type="checkbox"/> Mother's maiden name <input type="checkbox"/> Vehicle identifiers (e.g., license plates) <input type="checkbox"/> Mailing address <input type="checkbox"/> Phone numbers (e.g., phone, fax, and cell) <input type="checkbox"/> Medical records numbers <input type="checkbox"/> Medical notes <input type="checkbox"/> Financial account information and/or numbers (e.g., checking account number and Personal Identification Numbers [PIN]) <input type="checkbox"/> Certificates (e.g., birth, death, and marriage) <input type="checkbox"/> Legal documents or notes (e.g., divorce decree, criminal records, or other) <input type="checkbox"/> Device identifiers (e.g., pacemaker, hearing aid, or other) <input type="checkbox"/> Web Uniform Resource Locators (URL) <input type="checkbox"/> E-mail address <input type="checkbox"/> Education records <input type="checkbox"/> Military status and/or records <input type="checkbox"/> Employment status and/or records <input type="checkbox"/> Foreign activities and/or interests <input type="checkbox"/> Other: _____
38	<p>Does/Will the Web site provide a PDF form to be completed with IIF from any individuals and then mailed or otherwise provided to NASA?</p> <p>Note: If yes, identify what IIF the PDF form collects in the Comments column. If the category of personal information is not listed, please check "Other" and identify the category.</p>	<input type="checkbox"/>	X	<input type="checkbox"/>	<p>Personal Information:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Name <input type="checkbox"/> Date of birth <input type="checkbox"/> Social Security Number (or other number originated by a government that specifically identifies an individual) <input type="checkbox"/> Photographic identifiers (e.g., photograph image, x-rays, and video) <input type="checkbox"/> Driver's license <input type="checkbox"/> Biometric identifiers (e.g., fingerprint and voiceprint) <input type="checkbox"/> Mother's maiden name <input type="checkbox"/> Vehicle identifiers (e.g., license plates) <input type="checkbox"/> Mailing address <input type="checkbox"/> Phone numbers (e.g., phone, fax, and cell) <input type="checkbox"/> Medical records numbers <input type="checkbox"/> Medical notes <input type="checkbox"/> Financial account information and/or numbers (e.g., checking account number and Personal Identification Numbers [PIN]) <input type="checkbox"/> Certificates (e.g., birth, death, and marriage) <input type="checkbox"/> Legal documents or notes (e.g., divorce decree, criminal records, or other) <input type="checkbox"/> Device identifiers (e.g., pacemaker, hearing aid, or other) <input type="checkbox"/> Web Uniform Resource Locators (URL) <input type="checkbox"/> E-mail address <input type="checkbox"/> Education records <input type="checkbox"/> Military status and/or records <input type="checkbox"/> Employment status and/or records <input type="checkbox"/> Foreign activities and/or interests <input type="checkbox"/> Other: _____

No.	Privacy Question Sets	User Response			Comments
		Yes	No	N/A	
39	Does/Will the Web site <i>share</i> IIF with organizations external to NASA, or other people or organizations outside NASA? Note: If yes, specify with whom and for what purposes.	X	<input type="checkbox"/>	<input type="checkbox"/>	With whom and for what purposes: See block 18 above
40	Are rules of conduct in place (or will they be in place) for access to IIF on the Web site? Note: If yes, identify in the Comments column all categories of users with access to IIF on the system, and for what purposes the IIF is used.	X	<input type="checkbox"/>	<input type="checkbox"/>	X Users X Administrators X Developers X Contractors For what purposes: Official duties.
41	Does (or will) the Web site contain links to sites external to the Center that owns and/or operates the system? Note: If yes, note in the Comments column whether the system provides a disclaimer notice for users that follow external links to Web sites not owned or operated by the Center.	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/> Disclaimer notice for all external links
Administrative Controls					
42	Have there been major changes to the system since it was last certified and accredited? Note: If the system is under development and not yet certified and accredited at the time of this PIA, please describe in the Comments column the plan and timeline for conducting a certification and accreditation (C&A) for this system.	<input type="checkbox"/>	X	<input type="checkbox"/>	
43	Have personnel (system owners, managers, operators, contractors and/or program managers) using the system been (or will they be) trained and made aware of their responsibilities for protecting the IIF being collected and maintained?	X	<input type="checkbox"/>	<input type="checkbox"/>	
44	Who has /will have access to the IIF on the system? Note: Check all that apply in the Comments column.				X Users X Administrators X Developers X Contractors <input type="checkbox"/> Other
45	If contractors operate or use the system, do the contracts include clauses ensuring adherence to privacy provisions and practices?	X	<input type="checkbox"/>	<input type="checkbox"/>	Numerous contracts across the agency access the database containing the IIF. FAR PA Clause 52.224-2 is germane.

No.	Privacy Question Sets	User Response			Comments
		Yes	No	N/A	
46	Are methods in place to ensure that access to IIF is restricted to only those required to perform their official duties? Note: If yes, please specify method(s) in the Comments column.	X	<input type="checkbox"/>	<input type="checkbox"/>	Each individual access the system must be approved either by the system program administrator, or the system manager, and controlled by user ID's and passwords
47	Are there policies or guidelines in place for the retention and destruction of IIF within the application/system? Note: If yes, please provide some detail about these policies/practices in the Comments column.	<input type="checkbox"/>	X	<input type="checkbox"/>	The system is being updated to establish flags that will be set on records to notify the NFNMS administrator when records have met/exceeded their retention schedule, and are to be deleted from the system.
Technical Controls					
48	Are technical controls in place to minimize the possibility of unauthorized access, use, or dissemination of the data in the system (or will there be)?	X	<input type="checkbox"/>	<input type="checkbox"/>	
49	Are any of the password controls listed in the Comments column in place (or will they be)? Note: Check all that apply in the Comments column.	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Passwords expire after a set period of time. <input checked="" type="checkbox"/> Accounts are locked after a set period of inactivity. <input checked="" type="checkbox"/> Minimum length of passwords is eight characters. <input type="checkbox"/> Passwords must be a combination of uppercase, lowercase, and special characters. <input checked="" type="checkbox"/> Accounts are locked after a set number of incorrect attempts.
50	Is there (or will there be) a process in place to monitor and respond to privacy and/or security incidents?	X	<input type="checkbox"/>	<input type="checkbox"/>	
Physical Controls					
51	Are physical access controls in place (or will they be)	X	<input type="checkbox"/>	<input type="checkbox"/>	
- END -					

PIA Analysis Worksheet
Contact Information

Signature of NASA Cognizant Official

Signature of NASA Application Owner

William H. Morrison

John A. Piasecky

Print Name

Print Name

Asset Protection Manager, Security Management Division

Director, Security Management Division

Title/Position

Title/Position

NASA HQ, Office of Security and Program Protection

NASA HQ, Office of Security and Program Protection

Center and Office/Department

Center and Office/Department

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Fax Number

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Phone Number

Fax Number

December 16, 2005

December 16, 2005

Date

Date

Please go to the next page and complete the PIA Summary. This Summary will be made publicly available at <http://www.NASA.gov/pia>.

William H. Morrison

Print Name

Asset Protection Manager, Security Management Division

Title/Position

NASA HQ, Office of Security and Program Protection

Center and Office/Department

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Fax Number

December 16, 2005

Date

Privacy Impact Assessment (PIA) Summary

Date of this Submission (MM/DD/YYYY): December 16, 2005

NASA Center: NASA Headquarters

Application Name: NASA Foreign National Management System (NFMMS)

Is this application or information collection new or is an existing one being modified? Existing

Does this application collect, maintain, and/or disseminate information in identifiable form (IIF)? Yes

Mission Program/Project Supported: NASA Foreign National Management Program

Identifying Numbers (Use N/A, where appropriate)

Privacy Act System of Records Number: NASA 10 FNMS (05-16713)

OMB Information Collection Approval Number and Expiration Date: Pends

Other Identifying Number(s): N/A

Description

1. Provide an overview of the application or collection and indicate the legislation authorizing this activity.

The National Aeronautics and Space Administration Foreign National Management System is a system of records to document, track, manage, analyze, and/or report on foreign access to NASA resources. Routine uses of this system of records will be to determine eligibility of foreign nationals, and U.S. citizens representing foreign entities, to access NASA facilities and resources. The records in this system of records are intended for the sole use of the U.S. Government and its contractors who support U.S. Government operations, policies, laws and regulations.

Authority for this activity is derived from: Section 304(a) of the National Aeronautics and Space Act, codified at 42 USC § 2455; Federal Property Management Regulation, 41 CFR Ch. 101; 14 CFR parts 1203 through 1203b; 14 CFR 1213; 15 CFR 744; 22 CFR 62; 22 CFR 120-130; 40 USC 1441, and 44 U.S.C. 3101, and Executive Order 9397.

(See Federal Register System of Record Notice (SORN) 05-129 (NASA 10 FNMS))

2. Describe the information the agency will collect, maintain, or disseminate and how the agency will use the information. In this description, indicate whether the information contains IIF and whether submission is voluntary or mandatory.

Records in this system include information about the individuals seeking access to NASA resources. Information about individual may include, but is not limited to: name, home address, place of birth and citizenship, U.S. visitor/travel document numbers, employment information, Tax Identification Numbers (Social Security Number), and reason and length of proposed NASA access.

Routine uses of this system of records will be to determine eligibility of foreign nationals, and U.S. citizens representing foreign entities, to access NASA facilities and resources. The records in this system of records are intended for the sole use of the U.S. Government and its contractors who support U.S. Government operations, policies, laws and regulations.

Submission of requested information is voluntary.

See Federal Register System of Record Notice (SORN) 05-129 (NASA 10 FNMS)

3. Explain how the IIF collected, maintained, and/or disseminated is the minimum necessary to accomplish the purpose for this effort.

The information is collected directly from the individual. To achieve the objectives of the NFMMS, only the IIF information necessary to positively identify an individual, and to perform a national criminal data base check is obtained from individuals. This information may be shared with other government agencies as authorized by applicable laws and regulations.

See Federal Register System of Record Notice (SORN) 05-129 (NASA 10 FNMS)

4. Explain why the IIF is being collected, maintained, or disseminated.

Records are maintained and used by NASA to document, track, manage, analyze, and/or report on foreign visit and assignment access to NASA facilities including Headquarters, Field Offices, National Laboratories, Federally Funded Research and Development Centers, Contractor Sites, components facilities (NASA Management Office, Wallops Flight Facility, White Sands Test Facility, White Sands Complex, Independent Validation & Verification Facility, Michoud Assembly Center, Moffett Federal Airfield, Goldstone Deep Space Communications Complex, Goddard Institute for Space Studies, National Scientific Balloon Facility, Plum Brook Station).

The IIF is obtained to provide positive identification of individuals subject to capture in the system. The IIF information is maintained in the system to provide a record of previous and future visits for review by NASA security and export control managers. The IIF information is only disseminated to other government agencies as authorized by applicable laws and regulations.

See Federal Register System of Record Notice (SORN) 05-129 (NASA 10 FNMS)

5. Identify with whom the agency will share the IIF.

Routine uses of the records containing IIF are as follows:

A record from this system may be disclosed to:

1. authorized contractors who are responsible for NASA security and who require this information to perform their contractual obligations to NASA;
2. contractors, grantees, participants in cooperative agreements, collaborating researchers, or their employees, if required for the performance of their responsibilities with respect to national security, international visit and assignment, or foreign access;
3. a member of Congress submitting a request involving a constituent when the constituent has requested assistance from the member with respect to the subject matter of his or her own record. The member of Congress must provide a copy of the constituent's request for assistance;
4. foreign governments or international organizations if required by treaties, international conventions, or executive agreements;
5. members of a NASA Advisory Committee or Committees and interagency boards charged with responsibilities pertaining to international visits and assignments and/or national security when authorized by the individual or to the extent the committee(s) is so authorized and such disclosure is required by law;
6. Federal intelligence organizations, when required by applicable law;
7. Federal agencies for the purpose of determining preliminary visa eligibility when authorized by the individual or as required by law;
8. respond to White House inquiries when required by law;
9. a NASA contractor, subcontractor, grantee, or other Government organization involved in an investigation or administrative inquiry concerning a violation of a Federal or State statute or NASA regulation on the part of an officer or employee of the contractor, subcontractor, grantee, or other Government organization, when and to the extent the information is required by law;
10. an internal or external organization or element thereof, conducting audit activities of a NASA contractor or subcontractor to the extent required by law;
11. provide personal identifying data to Federal, State, local, or foreign law enforcement representatives seeking confirmation of identity of persons under investigation, to the extent necessary and required by law.

See Federal Register System of Record Notice (SORN) 05-129 (NASA 10 FNMS)

6. Describe how the IIF will be obtained, from whom it will be collected, what the suppliers of information and the subjects will be told about the information collection, and how this message will be conveyed to them (e.g., written notice, electronic notice if a Web-based collection, etc.). Describe any opportunities for consent provided to individuals regarding what information is collected and how the information will be shared.

The IIF will be solicited directly from the individual. The individual may be advised of the purposes for collecting this information as stated in 1-5 above. The information may be provided verbally or in written form. Individuals grant consent to the collection by providing the requested information.

7. State whether personal information will be collected from children under age 13 on the Internet and, if so, how parental or guardian approval will be obtained. (Reference: *Children's Online Privacy Protection Act of 1998*)

Information will not be collected from children.

8. Describe how the IIF will be secured.

The IIF will be secured using procedures set forth in NIST SP 800-18, NIST SP 800-53 and NIST SP 800-30.

9. Describe plans for retention and destruction of IIF.

NASA Procedural Requirements policy (NPR 1441.1 series; AFS# 1370 (35)) provides for the retention of the records for a period not to exceed 70-years. At the 70-year interval, the records will be removed from the system, and all media with the data either overwritten or destroyed.

10. Identify whether a system of records is being created under section 552a of Title 5, United States Code (the *Privacy Act*), or identify the existing Privacy Act system of records notice under which the records will be maintained.

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Identify a point of contact to whom a member of the public can address questions concerning this information system and the privacy concerns associated with it.

John A. Piasecky
Director, Security Management Division,
NASA HQ Office of Security and Program Protection

Date December 16, 2005

Concur:

S. Scott Santiago
Deputy Chief Information Officer
Information Technology Security

Date: December 16, 2005

Concur:

Approved for Publication:

Patti F. Stockman
NASA Privacy Act Officer

Patricia L. Dunnington
Chief Information Officer

Date: _____

Date: _____